

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

ROGER KRUEGER, et al.,

Plaintiffs,

v.

AMERIPRISE FINANCIAL, INC., et al.,

Defendants.

No. 11-CV-02781 (SRN/JSM)

JOINT MOTION FOR FINAL APPROVAL OF CLASS SETTLEMENT

The parties move this Court for final approval of the Class Action Settlement and move the Court to enter the proposed Final Order. This motion is supported by Plaintiffs' Memorandum of Law in Support of the Joint Motion for Preliminary Approval of Class Settlement (Doc. 596), as well as Plaintiffs' Memorandum in Support of Plaintiffs' Motion for Attorneys' Fees, Reimbursement of Expenses, and Incentive Awards for Named Plaintiffs (Doc. 608), the Declaration of Jennifer M. Keough, Chief Operating Officer, Garden City Group, LLC (Declaration of Mark Boyko ("Boyko Decl.") ¶3, Exhibit 1), and the Statements of Gallagher Fiduciary Advisors, LLC, as the Independent Fiduciary, approving of the settlement (Boyko Decl. ¶4, Exhibit 2), as well as this Court's Order Preliminarily Approving this Class Settlement (Doc. 604) and Plaintiffs' Memorandum in Support of this Motion. Defendants join in requesting that the Court enter an order finally approving the settlement and enter judgment in the form attached to this motion.

Dated: June 26, 2015

Respectfully submitted,

s/ Jerome J. Schlichter

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